

**REMARKS/ARGUMENTS**

In view of the amendments and remarks herein, favorable reconsideration and allowance of this application are respectfully requested. By this Amendment, claims 14 and 15 are amended. Thus, claims 14, 15, and 18 are pending for further examination.

Claims 14 and 18 have been rejected under 35 USC 103(a) as being obvious over Miller et al. (US 5,959,869), in view of Siegel et al. (US 4,413,260), Barrett et al. (US 5,214,761), and Werth et al. (US 4,369,442). Applicant respectfully submits that the amended claims herein are not rendered obvious by the cited references. Thus, reconsideration and withdrawal of this rejection are respectfully requested.

The Office Action concedes that the alleged combination of Miller, Siegel, and Barrett fails to teach or suggest “an interface being automatically displayed in the first screen and in the second screen when one of said specific buttons is used, said interface requiring a first code for enabling said first button to function as a request for adding in said file one credit to the credit reserve when this first button is touched, said interface requiring a second code for enabling said second button to function as a request for removing in said file one credit from the credit reserve when this second button is touched.” The Office Action thus introduces Werth to make up for this deficiency.

Applicant notes that obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill

in the art. *See* MPEP 2143.01. Although the Office Action states that it would have been obvious to one of ordinary skill in the art to combine these references, the Office Action fails to provide any motivation to combine the references as alleged. Applicant respectfully submits that merely reciting that the alleged combination would be obvious is insufficient to sustain a 35 USC 103(a) obviousness rejection because the Office Action has not made any arguments regarding the nature of the problem to be solved, the teachings of the prior art, or the knowledge of persons of ordinary skill in the art. *Cf. In re Rouffet*, 149 F.3d 1350, 1357, 47 USPQ2d 1453, 1457-58 (Fed. Cir. 1998). Thus, Applicant respectfully submits that the alleged combination can only be the result of improper hindsight. Applicant also notes that Werth discloses a tamper resistant system for coin counting and totaling net intake of vending machines (Col. 2, lines 30-33). Thus, Werth and the other prior art references are not analogous to a digital audiovisual reproduction system.

Even if the alleged combination were appropriate, it still would fail to render obvious the invention defined by the claims. According to Werth, a code is required for *accessing* the system, not for adding or subtracting a credit. Specifically, in Werth, the code is required for opening an electronic lock (col. 4, lines 12-14) and allowing access to read-out registers. Werth does appear to suggest providing different functions to servicemen, coin collectors, etc. and owners. But Werth does not teach or suggest providing different buttons on different screens for different classes of users.

The invention defined by the claims, however, requires “the first button being provided in a first displayed screen for the operator, the second button being provided in a second displayed screen for the manager.” Thus, the invention defined by the claims is patentably distinct from the alleged combination because, for example, it allows operators and managers to have different controls displayed on different screens activated by different codes, whereas Werth only allows different codes to activate different functions using the same screen. Simply stated, there is no connection in the alleged combination between the screen displayed and the code entered. Thus, Applicant respectfully submits that the alleged combination fails to render the invention defined by the claims obvious.

Claim 15 also has been rejected under 35 USC 103(a) as being unpatentable over Miller, Siegel, Barrett, and in further view of Kalis et al. (US 6,212,138). Applicant respectfully submits that Kalis fails to make up for the deficiencies noted above. Thus, even if the combination of Miller, Siegel, Barrett, and Kalis were proper, claim 15 should be allowable at least by virtue of its dependence from allowable independent amended claim 14. Similarly, claim 18 should be allowable at least by virtue of its dependence from allowable independent amended claim 14.

NATHAN  
Appl. No. 09/621,675  
June 5, 2006

In view of the amendments and remarks herein, Applicant believes that the amended claims herein clearly and patentably distinguish the prior art of record and are in condition for allowance. Thus, favorable reconsideration and allowance of this application are earnestly solicited.

Respectfully submitted,

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